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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

YVONNE ROBINSON, ROSE CIROS, JESSE R. HOWELL
individually and on behalf of all others similarly situated,
Plaintiffs,

vs.

KIA MOTORS AMERICA INC; KIA MOTORS
MANUFACTURING GEORGIA INC., KIA MOTORS
CORPORATION, Kia Motors Co., Ltd.,
SEOUL SOUTH KOREA COMPANY(S),
Hyundai Motor Company, XYZ CORP
Defendants.

Case No.: 13-00006 ES-SCM

X

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION
FOR ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS**

PLEASE TAKE NOTICE that at the Final Fairness Hearing scheduled for 6/19/2017 at 11:00 a.m Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their unopposed motion seeking (1) the payment of \$275,000.00 to Plaintiffs' Counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards to named plaintiffs (\$2,500.00 each to Yvonne Robinson, Rose Ciros, Robert McConnell, Jesse Howell & Cheryl Moxey; \$1,500.00 each to Phillip Doran and Irene Goodwin, who had both had their claims dismissed or a total amount of \$15,500.00 incentive total).

PLEASE FURTHER NOTE that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel and other related materials in support of this motion.

PLEASE FURTHER NOTE that Defendants do not oppose this motion.

Dated: November 7, 2016

Respectfully submitted,

/s/ Shmuel Klein